

# EXHIBIT 1



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# Transcript of Statement on the Record (Michael White)

**Date:** August 24, 2021

**Case:** Boshea -v- Compass Marketing, Inc.

**Planet Depos**

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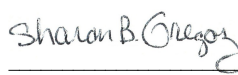
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Transcript of Statement on the Record (Michael White)  
Conducted on August 24, 2021

1 (1 to 4)

1	1	1	3
2	IN THE UNITED STATES DISTRICT COURT	2	A P P E A R A N C E S
3	FOR THE DISTRICT OF MARYLAND	3	ON BEHALF OF THE PLAINTIFF: (Via Zoom)
4	(Northern Division)	4	GREGORY JORDAN, ESQUIRE
5	----- X	5	JORDAN & ZITO
6	DAVID J. BOSHEA,   Case No.:	6	350 North Clark Street
7	Plaintiff,   1:21-cv-00309-ELH	7	Suite 400
8	v.	8	Chicago, Illinois 60654
9	COMPASS MARKETING, INC.,	9	(312) 854-7181
10	Defendant.	10	ON BEHALF OF THE DEFENDANT:
11	----- X	11	STEPHEN STERN, ESQUIRE
12	Statement on the Record of MICHAEL WHITE	12	KAGAN, STERN, MARINELLO & BEARD, LLC
13	Annapolis, Maryland	13	238 West Street
14	Tuesday, August 24, 2021	14	Annapolis, Maryland 21401
15	2:00 p.m.	15	(410) 216-7900
16		16	
17		17	
18	Job No.: 391893	18	Also Present: Ashby Everhart, Videographer
19	Pages: 1 - 7	19	Planet Depos
20	Reported by: Sharon Gregory, Court Reporter	20	Ron Bateman,
21		21	Representative for Compass Marketing
22		22	
2	2	4	4
1	Statement of MICHAEL WHITE, held at the	1	C O N T E N T S
2	law offices of:	2	TRANSCRIPT OF PROCEEDINGS PAGE
3		3	5
4	KAGAN, STERN, MARINELLO & BEARD, LLC	4	
5	238 West Street	5	
6	Annapolis, Maryland 21401	6	
7	(410) 216-7900	7	
8		8	
9		9	
10		10	
11	Pursuant to agreement, before Sharon Gregory,	11	
12	Professional Court Reporter and Notary Public of the	12	
13	state of Maryland.	13	
14		14	
15		15	
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<p style="text-align: right;">5</p> <p>1 PROCEEDINGS</p> <p>2 MR. STERN: We're here on the record for the</p> <p>3 deposition of Michael White who was issued a subpoena</p> <p>4 in this case. The case is David Boshea v. Compass</p> <p>5 Marketing, Inc., pending in the United States District</p> <p>6 Court, for the District of Maryland.</p> <p>7 On the video is counsel for Mr. Boshea.</p> <p>8 Greg, why don't you --</p> <p>9 MR. JORDAN: This is Gregory Jordan, counsel</p> <p>10 for David Boshea, the plaintiff.</p> <p>11 MR. STERN: And I'm Stephen Stern, counsel</p> <p>12 for Compass Marketing, Inc., the defendant in this</p> <p>13 case.</p> <p>14 And next to me here is a representative for</p> <p>15 the company. Why don't you introduce yourself.</p> <p>16 MR. BATEMAN: Ron Bateman, B-A-T-E-M-A-N.</p> <p>17 MR. STERN: It's 2 o'clock, the start</p> <p>18 time -- now actually 2:01 -- the actual time of the</p> <p>19 deposition. No one has heard anything from</p> <p>20 Michael White. He's not communicated in any way, he's</p> <p>21 not appeared at any point. Just wanted to go on the</p> <p>22 record and just note that we were ready to start at 2</p>	<p style="text-align: right;">7</p> <p>1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC</p> <p>2 I, Sharon B. Gregory, Court Reporter and Notary</p> <p>3 Public, the officer before whom the foregoing</p> <p>4 proceedings were taken, do hereby certify that the</p> <p>5 foregoing transcript is a true and correct record of</p> <p>6 the proceedings; that said proceedings were taken by me</p> <p>7 stenographically and thereafter reduced to typewriting</p> <p>8 under my supervision; and that I am neither counsel</p> <p>9 for, related to, nor employed by any of the parties to</p> <p>10 this case and have no interest, financial or otherwise,</p> <p>11 in its outcome.</p> <p>12 IN WITNESS WHEREOF, I have hereunto set my hand and</p> <p>13 affixed my notarial seal this 24th day of August, 2021.</p> <p>14 My commission expires:</p> <p>15 February 13, 2025</p> <p>16</p> <p>17 </p> <p>18</p> <p>19 NOTARY PUBLIC IN AND FOR</p> <p>20 THE STATE OF MARYLAND</p> <p>21</p> <p>22</p>
<p style="text-align: right;">6</p> <p>1 o'clock. We'll give a few more minutes to see if he</p> <p>2 appears and we'll take it from there. So we'll go off</p> <p>3 the record for little bit and resume shortly depending</p> <p>4 on what happens.</p> <p>5 (Off the record)</p> <p>6 MR. STERN: We're back on the record. It is</p> <p>7 2:18 p.m. Still no word from Mr. Michael White. He's</p> <p>8 not appeared. He's not given any communication to</p> <p>9 indicate that he's going to appear. We are certainly</p> <p>10 not releasing him from the subpoena, and we will follow</p> <p>11 up accordingly with the court procedures to protect our</p> <p>12 rights and get an order to compel his testimony.</p> <p>13 Greg, is there anything you need to add or</p> <p>14 that I left out for the record here?</p> <p>15 MR. JORDAN: No. I think you said</p> <p>16 everything succinctly.</p> <p>17 MR. STERN: Thank you very much.</p> <p>18 (Deposition concluded at 2:19 p.m.)</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	

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Transcript of Statement on the Record (Michael White)

Conducted on August 24, 2021

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